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June 03, 2003

Mr. Gary Lenz, APC Engineer PA Department of Environmental Protection Bureau of Air Quality 909 Elmertown Avenue Harrisburg, PA 17110-8200

Reference:

Natural Minor Permit No. 36-03033

Five (5) RFD Exemption Requests for Department Sources

Dear Mr. Lenz:

We wish to submit the enclosed Request for Determination (RFD) Forms to address the operation of five (5) separate departments in our facility, all of which have process exhausts that contain insignificant or deminimus quantities of emissions. Each of the 5 enclosed RFD's seeks the Department's consideration of an exemption for the Source's actual emissions which we have quantified.

Please call me if you have any questions on this filing.

Very truly yours,

Rick Daniels

Manager, Maintenance

Enclosures: RFD #3.1: Metal Finishing (1 copy)

RFD #3.2: Chemistry Laboratory (1 copy)

RFD #3.3: PCBA 1 (1 copy) RFD #3.4: PCBA 2 (1 copy) RFD #3.5: 762 Line (1 copy)

Bulova\DEP Ltr-5 RFDs0602



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(Sul	omit in Triplicate)	Operating Permit (NPD)	ê + 25
A.	Application is being made for: [please mark the app	propriate case(s)]	A R A
		☐ Exemption from Opera	ating Permit
	Physical Changes of Minor Significance		
	Changes Do Not Add New Equipment (See significance must not violate the terms of ar (APCA), the Clean Air Act or regulations ado emission increases above the emissions allow air quality impact for an air contaminant. Chan receipt of a written request unless the Department	n operating permit, the Pennsylvania pted thereunder. In addition, these o vable in the operating permit or result ges may be made within seven (7) da	nysical changes of minor Air Pollution Control Act changes can not result in t in an increased ambient bys after the Department's
	Changes Add New Equipment (See 25 Pa. Comust not violate the terms of an operating permaddition, these changes, which add new equipment allowable in the operating permit or result in a Changes can be made within 15 days after requests additional information or objects to the	mit, the APCA, the Clean Air Act or roment, cannot result in emission increand in increased ambient air quality impathe Department's receipt of a written	egulations thereunder. In ases above the emissions of for an air contaminant.
B.	Narrative Source Description (Include: process described diagram, material data safety sheet and any oth RFD #3.1: Metal Finishing Department (Metal Finish and Lubricating Processes)	er pertinent information - attach additi	onal sheets as needed):
C.	Facility Name	Plant Name:	
	Bulova Technologies, L.L.C.	Bulova Technologies, L.L.C	D
D.	Mailing Address: 101 North Queen Street, Lancaster, PA 17604		
E.	Contact Person: Rick Daniels	Title: Manager, Ma	intenance
F.	Telephone Number:	G. Federal	
	717/299-2581, Ext. 2508	23-2793	455
H.	Current Operating Permit No., if any: Natural Minor No. 36-03033	I. Date of I1981	nstallation:
J.	Location of Source(s): 1 of 5 Departmental Sources located within the facilit	100	er, PA 17604
K.	Municipality/Township:	County	
	City of Lancaster	Lancaster	
that	Rick Daniels, certify under penalty of law based on information and belief formed after reason are true, accurate and complete.	as provided in 18 Pa. C. S.A. § 4904 a sable inquiry, the statements and info	
(Sig	ned) lech bonnes	Date: (3/03	
Nan	ne (typed) Rick Daniels	Title: _Manager, Maintenance	9

Pollutant(s)	Emissions (lbs/	year) Emissions (tons/year)
Mixed Acid Gases	#29.9	#0.015
Mixed VOC's	#1,764	#0.882
M. List all source(s) exempted from perm exempted under a Request for Determine		This listing should include sources that wer rating Permit (RFD).
Source	Date Installed	Department Determination, if any
RFD #1: Conformal Coating Process –	3/98	DEP Exempted – 3/98
Relocate & Exhaust to Scrubber		
RFD #2: Phillips CB Assembly -	3/15/01	DEP Exempted 2/2/01
Soldering Exhaust to Scrubber		
N. Will the construction or modification of t at the facility? ☐ Yes ☒ No If yes, describe and quantify emission in		s RFD increase emissions from other source.
at the facility? Yes No If yes, describe and quantify emission in Will the construction or modification of (NSR) requirements or Prevention of Signature	creases on separate sheet(s). Pa. Code, Subchapter E, New Source Reviev
at the facility? ☐ Yes ☒ No If yes, describe and quantify emission in Will the construction or modification of (NSR) requirements or Prevention of Sig ☐ Yes ☒ No	creases on separate sheet(s the source be subject to 25 gnificant Deterioration (PSD)). Pa. Code, Subchapter E, New Source Reviev of Air Quality regulations?
at the facility? Yes No If yes, describe and quantify emission in Will the construction or modification of (NSR) requirements or Prevention of Signature	creases on separate sheet(s the source be subject to 25 gnificant Deterioration (PSD)). Pa. Code, Subchapter E, New Source Reviev
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at the facility?	creases on separate sheet(some source be subject to 25 the source be subject to 25 the source of the	Pa. Code, Subchapter E, New Source Review of Air Quality regulations? 127.14(a)(t)-(9)) le § 127.443 (a)).
at the facility?	creases on separate sheet(some source be subject to 25 gnificant Deterioration (PSD) OFFICIAL USE ONLY Source: (See 25 Pa. Code § Schis source: (See 25 Pa. Code §	Pa. Code, Subchapter E, New Source Review of Air Quality regulations? 127.14(a)(t)-(9)) le § 127.443 (a)), ed to submit a plan approval and/or operating
at the facility?	creases on separate sheet(some source be subject to 25 gnificant Deterioration (PSD) OFFICIAL USE ONLY Source: (See 25 Pa. Code § Schis source: (See 25 Pa. Code §	Pa. Code, Subchapter E, New Source Review of Air Quality regulations? 127.14(a)(t)-(9)) le § 127.443 (a)), ed to submit a plan approval and/or operating
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A.	Application is being made for: [please mark the application is being made for it being mad	ropriate case(s)]	P P S G
	Exemption from Plan Approval	☐ Exemption from Op	perating Permit
	Physical Changes of Minor Significance		
	Changes Do Not Add New Equipment (See significance must not violate the terms of an (APCA), the Clean Air Act or regulations adoptomission increases above the emissions allow air quality impact for an air contaminant. Chang receipt of a written request unless the Department.	operating permit, the Pennsylva oted thereunder. In addition, the vable in the operating permit or reges may be made within seven (7	nia Air Pollution Control Act se changes can not result in sult in an increased ambient days after the Department's
	Changes Add New Equipment (See 25 Pa. Comust not violate the terms of an operating pernaddition, these changes, which add new equipmallowable in the operating permit or result in ar Changes can be made within 15 days after the requests additional information or objects to the	nit, the APCA, the Clean Air Act on ment, cannot result in emission incoming increased ambient air quality in the Department's receipt of a wr	or regulations thereunder. In creases above the emissions apact for an air contaminant.
B.	Narrative Source Description (Include: process described flow diagram, material data safety sheet and any other RFD #3.2: Chemistry Laboratory (Metal Finishing Process)	er pertinent information - attach ac	Iditional sheets as needed):
C.	Facility Name	Plant Name:	
	Bulova Technologies, L.L.C.	Bulova Technologies, L	.L.C.
D.	Mailing Address: 101 North Queen Street, Lancaster, PA 17604		
E.	Contact Person: Rick Daniels	Title: Manager,	Maintenance
F.	Telephone Number: 717/299-2581, Ext. 2508	G. Fede 23-27	ral ID # '93455
Н.	Current Operating Permit No., if any: Natural Minor No. 36-03033	I. Date 1981	of Installation:
J.	Location of Source(s): 1 of 5 Departmental Sources located within the facility	at 101 North Queen Street, Lanc	aster, PA 17604
K.	Municipality/Township: City of Lancaster	County Lancaster	
that	Rick Daniels , certify under penalty of law a based on information and belief formed after reasonal are true, accurate and complete.		
that	based on information and belief formed after reasonal are true accurate and complete.		

Mixed Acid Gases Mixed VOC's #952 #0.008 Mixed VOC's #952 #0.476 M. List all source(s) exempted from permitting within last five years. This listing should include sources that we exempted under a Request for Determination for Plan Approval/Operating Permit (RFD). Source RFD #1: Conformal Coating Process – Relocate & Exhaust to Scrubber RFD #2: Philips CB Assembly – Soldering Exhaust to Scrubber N. Will the construction or modification of the source covered under this RFD increase emissions from other source at the facility? Yes No If yes, describe and quantify emission increases on separate sheet(s). Will the construction or modification of the source be subject to 25 Pa. Code, Subchapter E, New Source Revier (NSR) requirements or Prevention of Significant Deterioration (PSD) of Air Quality regulations? Determination of the source (See 25 Pa. Code § 127, 14(a)(1)-(9)). A noperating permit is not required for this source. (See 25 Pa. Code § 127, 14(a)(1)-(9)). An operating permit is not required for this source. (See 25 Pa. Code § 127, 14(a)(1)-(9)). An operating permit is not required for this source. (See 25 Pa. Code § 127, 14(a)(1)-(9)). An operating permit is not required for this source. (See 25 Pa. Code § 127, 14(a)(1)-(9)). An operating permit is not required for this source. (See 25 Pa. Code § 127, 14(a)(1)-(9)). An operating permit is not required for this source. (See 25 Pa. Code § 127, 14(a)(1)-(9)). Name and Title	Pollutant(s)	Emissions (lbs/	vear) Emiss	ions (tons/year)
M. List all source(s) exempted from permitting within last five years. This listing should include sources that we exempted under a Request for Determination for Plan Approval/Operating Permit (RFD). Source Date Installed Department Determination, if any DEP Exempted – 3/98 RED #1: Conformal Coating Process – Relocate & Exhaust to Scrubber RFD #1: Conformal Coating Process – Relocate & Exhaust to Scrubber DEP Exempted – 3/98 DEP Exempted 2/2/01 DEP Exempted 2/2/01 N. Will the construction or modification of the source covered under this RFD increase emissions from other source at the facility? Yes No If yes, describe and quantify emission increases on separate sheet(s). Will the construction or modification of the source be subject to 25 Pa. Code, Subchapter E, New Source Revier (NSR) requirements or Prevention of Significant Deterioration (PSD) of Air Quality regulations? OFFICIAL USE ONLY Date Received: A plan approval is not required for this source. (See 25 Pa. Code § 127.14(a)(1)-(9)). A plan approval is not required for this source. (See 25 Pa. Code § 127.443 (a)). The source(s) do(es) not qualify for exemption. Applicant is required to submit a plan approval and/or operating permit application. Name and Title				
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N. Will the construction or modification of the source covered under this RFD increase emissions from other source at the facility?	Relocate & Exhaust to Scrubber			2
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Date Received: 6/4/03 Reviewed By: 62/2 A plan approval is not required for this source. (See 25 Pa. Code § 127.14(a)(1)-(9)). An operating permit is not required for this source. (See 25 Pa. Code § 127.443 (a)). The source(s) do(es) not qualify for exemption. Applicant is required to submit a plan approval and/or operating permit application. Resolution Reviewed By: 62/2 Name and Title Date			DED increase emission	es from other neuron
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Permit application Rould Oan Chil 105@Sedia Signature Name and Title Date	at the facility? ☐ Yes ☒ No If yes, describe and quantify emission incomplete will the construction or modification of the (NSR) requirements or Prevention of Sig ☐ Yes ☒ No Date Received:	creases on separate sheet(sheet(sheet)) he source be subject to 25 nificant Deterioration (PSD) OFFICIAL USE ONLY	Pa. Code, Subchapter E, of Air Quality regulations?	New Source Reviev
Signature Name and Title Date	at the facility?	creases on separate sheet(she source be subject to 25 nificant Deterioration (PSD) OFFICIAL USE ONLY Re ource. (See 25 Pa. Code §	Pa. Code, Subchapter E, of Air Quality regulations? viewed By: (4) (4) (1) (9) (1)	New Source Reviev
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A.	Application is being made for: [please mark the application of the second of the secon	ropriate case(s)]	- H H H H H H H H H H H H H H H H H H H
		☐ Exemption from Operat	ing Permit
	Physical Changes of Minor Significance		<u> </u>
	Changes Do Not Add New Equipment (See significance must not violate the terms of an (APCA), the Clean Air Act or regulations adoptomission increases above the emissions allow air quality impact for an air contaminant. Change receipt of a written request unless the Department.	operating permit, the Pennsylvania oted thereunder. In addition, these crable in the operating permit or result ges may be made within seven (7) day	Air Pollution Control Act hanges can not result in in an increased ambient ys after the Department's
	Changes Add New Equipment (See 25 Pa. C must not violate the terms of an operating perr addition, these changes, which add new equipment allowable in the operating permit or result in a Changes can be made within 15 days after the requests additional information or objects to the	nit, the APCA, the Clean Air Act or re ment, cannot result in emission increa n increased ambient air quality impac the Department's receipt of a written	gulations thereunder. In ses above the emissions at for an air contaminant.
В.	Narrative Source Description (Include: process described flow diagram, material data safety sheet and any other RFD #3.3: Printed Circuit Board A 1 (Soldering Operation)	er pertinent information - attach addition	
C.	Facility Name	Plant Name:	
	Bulova Technologies, L.L.C.	Bulova Technologies, L.L.C	.
D.	Mailing Address: 101 North Queen Street, Lancaster, PA 17604		
E.	Contact Person: Rick Daniels	Title: Manager, Mai	ntenance
F.	Telephone Number:	G. Federal I	D#
	717/299-2581, Ext. 2508	23-27934	155
Н.	Current Operating Permit No., if any: Natural Minor No. 36-03033	i. Date of Ir 1981	nstallation:
J.	Location of Source(s): 1 of 5 Departmental Sources located within the facility	y at 101 North Queen Street, Lancaste	er, PA 17604
K.	Municipality/Township: City of Lancaster	County Lancaster	
that	Rick Daniels , certify under penalty of law at based on information and belief formed after reason are true, accurate and complete.	as provided in 18 Pa. C. S.A. § 4904 and able inquiry, the statements and information	and 35 P.S. § 4009(b)(2), rmation contained in this
(Sig	gned) Ruk Amush	Date:	
Nan	me (typed) Rick Daniels	Title: Manager, Maintenance	

Pollutant(s)	Emissions (lbs/	year)	Emissions (tons/year)
PM ₁₀	#25		#0.0125
Lead (Pb)	#8.35		#0.0042
M. List all source(s) exempted from perm exempted under a Request for Determine			
Source	Date Installed	Depa	artment Determination, if any
RFD #1: Conformal Coating Process – Relocate & Exhaust to Scrubber	3/98		empted – 3/98 -
RFD #2: Phillips CB Assembly – Soldering Exhaust to Scrubber	3/15/01	DEP Exe	empted 2/2/01
N. Will the construction or modification of t at the facility? ☐ Yes ☒ No			ase emissions from other source
	creases on separate sheet(s	i. Pa. Code, Si	ubchapter E, New Source Revie
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		Operating Permit (RFD)	2 - 5-
(Su	omit in Triplicate)		PH PH
A.	Application is being made for: [please mark the ap	propriate case(s)]	
	Exemption from Plan Approval	☐ Exemption from	Operating Permit
	Physical Changes of Minor Significance		
	Changes Do Not Add New Equipment (Sesignificance must not violate the terms of a (APCA), the Clean Air Act or regulations added emission increases above the emissions allowair quality impact for an air contaminant. Characterist of a written request unless the Department	n operating permit, the Penns opted thereunder. In addition, wable in the operating permit onges may be made within sever	ylvania Air Pollution Control Act these changes can not result in or result in an increased ambient on (7) days after the Department's
	Changes Add New Equipment (See 25 Pa. 6 must not violate the terms of an operating per addition, these changes, which add new equipallowable in the operating permit or result in a Changes can be made within 15 days after requests additional information or objects to the	rmit, the APCA, the Clean Air A pment, cannot result in emission an increased ambient air qualit the Department's receipt of a	Act or regulations thereunder. In n increases above the emissions ty impact for an air contaminant.
В.	Narrative Source Description (Include: process des flow diagram, material data safety sheet and any other		
0	RFD #3.4: Printed Circuit Board A 2 (Soldering Operation of State of Soldering Operation of		
C.	Bulova Technologies, L.L.C.	Bulova Technologie	es, L.L.C.
D.	Mailing Address: 101 North Queen Street, Lancaster, PA 17604		
E.	Contact Person: Rick Daniels	Title: Manag	ger, Maintenance
F.	Telephone Number: 717/299-2581, Ext. 2508		ederal ID # 3-2793455
Н.	Current Operating Permit No., if any: Natural Minor No. 36-03033		rate of Installation: 981
J.	Location of Source(s): 1 of 5 Departmental Sources located within the facili	ty at 101 North Queen Street, L	ancaster, PA 17604
K.	Municipality/Township: City of Lancaster	County Lancas	
that			§ 4904 and 35 P.S. § 4009(b)(2), and information contained in this
	" V. l. VIn al	- //21	- 2
(Sig	ned)	Date:	63

Pollutant(s)	Emissions (lbs/	year) Emissions (ton	s/vear)
PM ₁₀	#25	#0.0125	
Lead (Pb)	#8.35	#0.0042	
M. List all source(s) exempted from permit exempted under a Request for Determination	ting within last five years. ation for Plan Approval/Oper	This listing should include source ating Permit (RFD).	es that w
Source	Date Installed	Department Determination	n, if any
RFD #1: Conformal Coating Process – Relocate & Exhaust to Scrubber	3/98	DEP Exempted – 3/98	-
RFD #2: Phillips CB Assembly – Soldering Exhaust to Scrubber	3/15/01	DEP Exempted 2/2/01	
at the facility? Yes No If yes, describe and quantify emission income. Will the construction or modification of the	reases on separate sheet(s) se source be subject to 25 F	Pa. Code, Subchapter E. New Sou	
at the facility?	reases on separate sheet(s) se source be subject to 25 F nificant Deterioration (PSD) o	Pa. Code, Subchapter E. New Sou	
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(Sul	bmit in Triplicate)	
A.	Application is being made for: [please mark the	appropriate case(s)]
	⊠ Exemption from Plan Approval	☐ Exemption from Operating Permit
	Physical Changes of Minor Significance	Name of the state
	significance must not violate the terms of (APCA), the Clean Air Act or regulations a emission increases above the emissions a air quality impact for an air contaminant. Cl	See 25 Pa. Code § 127.14(c)(1)). Physical changes of minor an operating permit, the Pennsylvania Air Pollution Control Act adopted thereunder. In addition, these changes can not result in allowable in the operating permit or result in an increased ambient hanges may be made within seven (7) days after the Department's attment requests additional information or objects to the changes.
	must not violate the terms of an operating paddition, these changes, which add new equallowable in the operating permit or result in	a. Code § 127.14(c)(2)). Physical changes of minor significance permit, the APCA, the Clean Air Act or regulations thereunder. In uipment, cannot result in emission increases above the emissions in an increased ambient air quality impact for an air contaminant, ter the Department's receipt of a written unless the Department of the changes.
В.		description, control device, exhaust volume, stack data, schematic other pertinent information - attach additional sheets as needed):
	RFD #3.5: 762 Line (Packaging/Stenciling/Sealing	ng/Gluing/Bonding)
C.	Facility Name	Plant Name:
	Bulova Technologies, L.L.C.	Bulova Technologies, L.L.C.
D.	Mailing Address: 101 North Queen Street, Lancaster, PA 17604	
E.	Contact Person: Rick Daniels	Title: Manager, Maintenance
F.	Telephone Number:	G. Federal ID #
	717/299-2581, Ext. 2508	23-2793455
Н.	Current Operating Permit No., if any: Natural Minor No. 36-03033	I. Date of Installation: 1981
J.	Location of Source(s): 1 of 5 Departmental Sources located within the fa	cility at 101 North Queen Street, Lancaster, PA 17604
K.	Municipality/Township: City of Lancaster	County Lancaster
that		aw as provided in 18 Pa. C. S.A. § 4904 and 35 P.S. § 4009(b)(2), sonable inquiry, the statements and information contained in this
(Sig	gned) _ Kiele Donnel	Date: 6 3 0 3
Nan	me (typed) Rick Daniels	Title: Manager, Maintenance

Pollutant(s)	Emissions (lbs/	year) Emissions (tons/year)
Vixed VOC's	#84	#0.042
		This listing should include sources that w
exempted under a Request for Determination	Date Installed	Department Determination, if any
RFD #1: Conformal Coating Process – Relocate & Exhaust to Scrubber	3/98	DEP Exempted – 3/98
RFD #2: Phillips CB Assembly – Soldering Exhaust to Scrubber	3/15/01	DEP Exempted 2/2/01
N. Will the construction or modification of th	e source covered under this	s RFD increase emissions from other source
N. Will the construction or modification of th at the facility? If yes, describe and quantify emission inci		
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